

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JANE DOE,

Plaintiff,

v.

ANDREW K. MITCHELL, et al.,

Defendants.

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Case No. 2:20-cv-00459

Judge James Graham

Magistrate Judge Litkovitz

**DEFENDANT CITY OF COLUMBUS'S OBJECTIONS
TO THE MAGISTRATE JUDGE'S REPORT AND RECOMMENDATION**

Defendant City of Columbus, by counsel, submits its objections to the Magistrate Judge's Report and Recommendation (R&R) which recommends that the Court allow Plaintiff to proceed in this case pseudonymously. (Doc. 24) Defendant Andrew K. Mitchell has also filed objections to the R&R. (Doc. 27) Defendant City hereby joins Defendant Mitchell's objections and those objections are hereby incorporated by reference as though fully restated herein.

In addition to the reasons articulated in Defendant Mitchell's objections, it is the City's position that the Magistrate Judge failed to address the City's argument that, not only is Plaintiff seeking to proceed pseudonymously well after her complaint was filed and after the statute of limitations has run, she also is attempting to amend her complaint after the court's deadline for doing so. The case schedule set August 3, 2020, as the date to amend pleadings. Plaintiff's September 29, 2020, motion to amend the complaint therefore, was untimely and should be denied.

Respectfully submitted,

**CITY OF COLUMBUS, DEPARTMENT OF LAW
ZACH KLEIN, CITY ATTORNEY**

/s/ Janet R. Hill Arbogast

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically on December 22, 2020. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Janet R. Hill Arbogast

Janet R. Hill Arbogast

Assistant City Attorney